

RESPONSE TO PUBLIC COMMENTS
FOR THE
CHEMICAL STOCKPILE DISPOSAL PROGRAM
CHANGE MANAGEMENT PROCESS

Response to Public Comments

In July 1997, PMCD presented the change management process to the communities of Tooele, Utah; Hermiston, Oregon; and Anniston, Alabama. PMCD sought public input to the change management process and held a 21-day comment period. After the comment period, the Army analyzed each comment received and prepared a response designed to answer questions and address concerns. To ensure all readers will find this document understandable, both the comments and responses are presented in a streamlined format. To facilitate review of this document, comments and responses are grouped by the following general subjects:

- Section 1: Comments on Involving the Public in Change Management
- Section 2: General Comments on Public Involvement
- Section 3: Comments on the Change Management Process
- Section 4: Comments on Risk Assessments in the Change Management Process
- Section 5: Comments on Public Involvement in Developing Risk Assessments
- Section 6: General Comments on Risk Assessments
- Section 7: Comments on the *Guide to Risk Management Policy and Activities*

The Army received more than 100 specific comments during the comment period. This document summarizes the comments received and provides a response to each comment. Copies of the comments exactly as they were received by the Army, as well as a copy of the transcripts of each of the meeting proceedings are available at the outreach office.

SECTION 1: COMMENTS ON INVOLVING THE PUBLIC IN CHANGE MANAGEMENT		
#	Source of Comment (Verbatim Comments Available at the Outreach Office)	Comments and Responses
1-1	Tooele - Mailed Page B-6	<p>Comment: Is the proposed three-week comment period for the change management process in addition to the Resource Conservation and Recovery Act (RCRA) process or a part of the RCRA process?</p> <p>Response: The criteria for implementing the change management process have been changed such that they are independent of the RCRA permit change classification. However, for those changes affecting the RCRA permit, the proposed comment period is in addition to the RCRA process. The RCRA process does not involve the local community until after the permit application is submitted. The Army is suggesting adding an earlier opportunity for public involvement that will increase community input into the decision-making process</p>
1-2	Tooele - Mailed Page B-6	<p>Comment: What is the role of the Citizens' Advisory Commission (CAC) in the public comment process?</p> <p>Response: As established public forums at each of the stockpile sites, the Army proposed the CAC meetings as a possible mechanism for disseminating information and receiving comments related to the change management process. To date, public input into the process suggests that the CACs should not be the only mechanism for communicating with and involving the local communities. At this time, the Army proposes to ensure CAC members are informed about proposed changes and about the public comment process, but does not anticipate utilizing the CACs as the only channels for communicating information from the Army to the public and for providing comments from the public to the Army. Specifically, the Army anticipates utilizing the CACs as a local resource for gauging public opinion on certain issues, such as the type and level of community involvement necessary or desired for a proposed change.</p>

1-3	Tooele - Mailed Page B-2	<p>Comment: What happens if the public does not believe a proposed change is needed; will the Army proceed with the proposed change anyway?</p> <p>Response: The Army will weigh a number of factors – risk, health and safety, schedule and cost, environmental regulations, and legislative concerns. Strong consideration will be given to public viewpoints regarding the change and these factors. It is difficult to anticipate the specific issues a local community may have with a hypothetical change. Most likely, in some instances the Army will abandon a proposed change and in others it will proceed, depending on the specific facts of the issue.</p> <p>The Army anticipates that public support for some proposed changes, public opposition to some proposed changes, and a public split on some proposed changes. While no decision-making process can satisfy every stakeholder, the goal of the change management process is to build consensus among concerned stakeholders prior to making the actual decision.</p> <p>It should be noted that there remains some concern among Army leadership that public viewpoints could "force" a decision that the Army alone would be accountable for later. Despite this possibility, the Army remains committed to the change management process and encourages public involvement in key decisions.</p>
1-4	Tooele - Mailed Page B-8	<p>Comment: What is the method for letting the public know their concerns are being heard and addressed?</p> <p>Response: The proposed public involvement process includes provisions for recording the proceedings of each formal meeting and multiple mechanisms for interested citizens to provide comments directly to Army representatives – via in-person interactions, outreach office visits, regular mail, electronic mail, and voice mail through a toll-free telephone line. The Army will respond in writing to all comments received throughout the designated comment period. The response to comments document will record the Army's actions to address public concerns and the impact of public comments on the final decision. This document will be available in the outreach offices, and individuals on the site mailing lists will receive mailed notification of its availability.</p>

1-5	Tooele - Meeting Page B-13	<p>Comment: It would be helpful to hear a summary of the purpose of the workshop and poster session at the beginning of the meeting, particularly since some of the posters were hard to understand and could be improved.</p> <p>Response: In response to this comment, the Army incorporated this suggestion into the next two workshops and briefly explained the proposed public involvement process at the start of the working group sessions in Hermiston and Anniston. Both subsequent sessions began with a better understanding of the purpose of the working group. The Army is also taking steps to ensure that the posters used during the poster session are more understandable.</p>
1-6	Tooele - Meeting Page B-13	<p>Comment: What will the Army do if the public does not provide input into the decision-making process?</p> <p>Response: The change management process provides the <i>opportunity</i> for the local community to comment on proposed changes. The Army is refining its public involvement procedures to encourage local community participation in the change management process.</p> <p>If, for whatever reason, the community chooses not to comment on a particular change, then the Army would proceed with the change management process as described in the <i>Guide to Risk Management Policy and Activities (Risk Guide)</i>. In these cases, the Army would base final decisions on other factors, such as health, safety and risk minimization.</p>

1-7	Hermiston - Meeting Page B-16	<p>Comment: The poster session followed by a roundtable public workshop was an excellent format that provided a chance to learn about the program first, then meet to discuss specific issues.</p> <p>Response: The Army's desire is to increase participation by members of the local communities, and one important factor in that participation is to ensure that the public has the necessary program information. The Army believes that providing information to the public results in an informed decision and facilitates public involvement. While face-to-face meetings between program managers and the local community are an important means for improving public knowledge and gaining trust, the Army is also refining the change management process to ensure that the most suitable methods of communicating the proposed change and soliciting public comments are adopted.</p> <p>The Army notes that while the poster session/public workshop was successful in one community, other communities may find other public involvement mechanisms more beneficial. As a result, the change management public involvement plan recommends a series of public involvement opportunities to support each decision-making process, rather than focusing on a public workshop as the focal point for that process.</p>
1-8	Hermiston - Meeting Page B-15	<p>Comment: Why does the Army involve the public in technical decision-making when it is clear that the experts are better able to understand the issues and choose the best option?</p> <p>Response: Certainly, the Army's chemical demilitarization program possesses significant technical expertise both within the Army and through the independent oversight provided by the National Research Council (NRC). However, such expertise is not necessarily limited to the program. In particular, consideration of community viewpoints is absolutely necessary when technical information is used to form public policy.</p> <p>Participation by the local community ensures that the Army has access to the broadest perspective on the program – a perspective that will ensure the Army understands and considers all the issues pertinent to risk-based decision making. Because there will always be new stakeholders to inform and involve, the Army is open to refining its involvement processes to encourage local community participation in the program.</p>

1-9	Hermiston - Meeting Page B-15	<p>Comment: If the Army continues to get public involvement, the schedule will be delayed, the incinerator will never get built, and we will never get rid of the stockpile.</p> <p>Response: This proposed public involvement process is designed to ensure public involvement in the critical stages of the decision-making process. While a "built-in" process to solicit and respond to public comment may require extra time before developing a final decision, the Army believes this process is necessary to ensure the public understands and contributes to the decisions related to effective design and safe operations of each facility.</p> <p>The highest priority of the Army is safety; the Army will never make program decisions that compromise safety. The change management process, including provisions for public involvement, is a method for identifying local concerns involved in the risk-based decisions for safe disposal of chemical munitions.</p> <p>While progress may seem slow, the program continues to move forward in building chemical weapons disposal facilities. Because public involvement is an important factor in this progress, the Army plans to continue further involvement.</p>
1-10	Hermiston - Transcript Page 88	<p>Comment: A 21-day public comment period is not long enough.</p> <p>Response: Based on public input during the change management process workshops and information received during the public comment period, the Army revised the process so that the comment period will be 30 days instead of 21 days.</p>
1-11	Hermiston - Transcript Page 101	<p>Comment: The format of the workshop was excellent.</p> <p>Response: The Army appreciates positive feedback and will continue to utilize this format or other interactive formats in the future, as well as utilizing additional communication tools to increase public involvement.</p>

1-12	Hermiston - Transcript Page 78	<p>Comment: Can the current public involvement system under RCRA be enhanced rather than creating the new change management process?</p> <p>Response: The change management process is now separate from the RCRA process, and it is therefore important that the change management process public involvement mechanism be separate from the RCRA public involvement mechanism. The Army is implementing the change management process to solicit public participation in the decision-making process prior to deciding whether the proposed change should be adopted. For those changes that would require a RCRA permit modification, the change management process is enhancing the RCRA process by gaining the local community's views prior to beginning the formal RCRA process.</p>
1-13	Hermiston - Transcript Page 28	<p>Comment: I applaud your effort, and hope that the outcome of the public participation is positive.</p> <p>Response: Thank you for your comment. The Army appreciates positive feedback and looks forward to your participation in future proposed change decision-making.</p>
1-14	Hermiston - Transcript Page 26	<p>Comment: How does the Army plan to facilitate two-way communication with the public?</p> <p>Response: The Army will utilize several communication mechanisms to communicate with and receive feedback from the communities. For example, the Program Manager for Chemical Demilitarization (PMCD) is redesigning the existing World Wide Web site and toll-free telephone line to better serve the public's needs. The Army will also mail information about proposed changes to local residences, publish public service announcements, and conduct public workshops and availability sessions to communicate about a proposed change and to gain the public's insight to proposed changes.</p>

1-15	Anniston - Meeting Page B-18	<p>Comment: People who could benefit financially or otherwise (e.g., depot employees, contractors, etc.) should be barred from the public involvement process.</p> <p>Response: The intent of the public involvement process is to be as inclusive as possible in allowing members of the community to voice their support and/or concerns about proposed changes to a chemical weapons disposal facility. While it is true that community members work at the depot and are involved with many different aspects of the program, these employees are also members of the general public with respect to their life outside the workplace. As such, the Army does not support excluding any community members from the public involvement process.</p>
1-16	Anniston - Meeting Page B-19	<p>Comment: Public input should be solicited from mailings, through public service announcements, at the outreach offices, and during public forums, not through the CACs. Additionally, public input should play a decisive role in the process.</p> <p>Response: The proposed public involvement plan for change management includes multiple methods, including those described in the comment, for soliciting public input into the decision-making process. The plan also details how the Army will respond to the input received and utilize the comments and suggestions to develop a final decision.</p>
1-17	Anniston - Transcript Page 33	<p>Comment: Forming a citizen technical team would support the public in evaluating proposed changes and would help community members contribute to the decision-making process from a more informed position.</p> <p>Response: The CACs have on occasion sought independent expertise on technical issues. At the discretion of the CACs, similar technical support for evaluation of change management process issues may be necessary.</p>

1-18	Anniston - Transcript Page 37	<p>Comment: How much weight will the comments received get and how will they actually be used?</p> <p>Response: The Army will make every attempt to accommodate community viewpoints to the greatest extent possible. It is difficult to offer a general response to this question as the change management process is meant to address proposed changes on a case-by-case basis, but generally the Army will evaluate all comments received and weigh the public input against all other factors (e.g., risk, schedule and cost). As a result, for example, the Army could move forward with a proposed change the public does not support because public opposition does not outweigh other factors, such as reduced risk to facility workers or decreased costs with no impact on risk. Alternatively, the public's input about a specific change could signal to the Army that the impact of a proposed change on the local community would outweigh</p>
1-19	Anniston - Transcript Page 25	<p>Comment: Can the community be involved in the identification of a potential change? For example, can a community member suggest a change to the facility and initiate the process for review of a potential permit modification?</p> <p>Response: The Army intends for the change management process – and its associated public involvement activities – to augment existing mechanisms for the public to comment on the chemical demilitarization program. For example, the CACs were established as a community-based forum for members of the public to express concerns, and can be used by the citizens to request assistance with these types of requests. Community members can also contact the Army directly through the local outreach offices.</p>

1-20	Anniston - Transcript Page 28	<p>Comment: The CAC should not be the only avenue for getting comments to the Army. Is it correct to assume that the outreach office is also an appropriate avenue for submitting comments on this process or on any issues related to the facility?</p> <p>Response: As noted previously, the Army is re-evaluating the role of the CACs in the change management process. While that assessment continues, the Army encourages residents not just to receive information from the outreach offices, but to contribute comments and express concerns via the outreach offices.</p>
SECTION 2: GENERAL COMMENTS ON PUBLIC INVOLVEMENT		
2-1	Tooele - Mailed Page B-9	<p>Comment: The Army should consider improvements to the "store front" outreach offices to ensure that all information about the program and its activities is available to the public.</p> <p>Response: The Army plans to utilize the outreach offices as one mechanism for providing access to and distribution of information about the change management process in general and about specific proposed changes. Any comments about how to improve the presentation of information at the outreach offices or about how to access that information are welcome.</p>
2-2	Tooele - Mailed Page B-8	<p>Comment: The public should have several different avenues by which to gain information about the program other than through printed material.</p> <p>Response: The Army agrees that opportunities to interact directly with the public are important to ensure meaningful public involvement. However, the Army also recognizes that workshops and other public forums are not always convenient for community members to attend. Consequently, the public involvement plan for the change management process will include a number of diverse public outreach and public involvement methods to reach and include as wide a community as possible.</p>

2-3	Tooele - Mailed Page B-8	<p>Comment: The current method of public outreach and involvement does not address public concerns.</p> <p>Response: The Army developed the public involvement portion of the change management process specifically as a mechanism to identify and incorporate public concerns in the decision-making process. While members of the public have always had an opportunity to provide comments and express concerns to the Army about chemical demilitarization activities, this proposed public involvement process will enhance the public's formal role in decision-making. Additionally, the process includes a step that requires the Army to compile all comments and concerns into a single document and to provide a response to those comments and concerns to accompany the final decision.</p>
2-4	Tooele - Meeting Page B-11	<p>Comment: Advisory groups, such as the CACs, do not reflect the general population's concerns.</p> <p>Response: PMCD realizes that some residents are dissatisfied with certain aspects of the CACs; however, the CACs are appointed by the governor who is a representative of the community. PMCD will continue to pursue methods to better involve the general public in decision-making (e.g., surveys, public meetings, citizens advisory board) through the life of the program.</p>
2-5	Tooele - Meeting Page B-11	<p>Comment: Citizens should be compensated for providing input to the Army's disposal program.</p> <p>Response: The change management process is intended as a means to allow citizens to participate in the decision-making process if they so desire. At this time a compensation program is not envisioned.</p>

2-6	Tooele - Meeting Page B-11	<p>Comment: Everyone, including government and contractor employees, should participate in public meetings.</p> <p>Response: The intent of the public involvement process is to be as inclusive as possible in allowing members of the community to voice their support and/or concerns about proposed changes to a chemical weapons disposal facility. The Army does not support excluding any community members from the public involvement process. However, PMCD is aware of public concern that input from those community members with a vested interest in the Army's operations may carry a bias. Again, PMCD stresses the input of as many community members, with as many different viewpoints, as possible to ensure the Army receives the most balanced input possible from the community.</p>
2-7	Tooele - Meeting Page B-11	<p>Comment: The Army should conduct more informational type programs so that the communities are aware of what is happening in the disposal program.</p> <p>Response: While such programs as the change management process actively provide information to the community, interested citizens can access information from the Army through several sources. For example, the community outreach offices are available for citizens to get information, provide comments, and learn more about all aspects of the disposal program. Staff from the outreach offices regularly attend fairs, talk at local schools, and speak to public interest groups in an effort to educate the public on the disposal program. PMCD encourages you to stop by the outreach office or call PMCD directly so that you may learn more about the disposal program in your community.</p>
2-8	Tooele - Meeting Page B-11	<p>Comment: To get the participation of the general public, the Army should offer an incentive.</p> <p>Response: As noted earlier, the change management process offers a way for concerned citizens to participate in the decision-making process. No compensation program is currently planned.</p>

2-9	Tooele - Meeting Page B-11	<p>Comment: A survey needs to be conducted to gauge the public's interest and feelings about the disposal of chemical weapons.</p> <p>Response: PMCD utilizes several methods to gauge public interest (e.g., outreach offices, mailings, public meetings, etc.) In addition, PMCD recently commissioned a survey in the Tooele community. In analyzing the survey results, PMCD will decide whether to proceed with additional surveys as useful mechanisms for gauging public input in other disposal communities.</p>
2-10	Tooele - Meeting Page B-13	<p>Comment: Would the Army consider establishing a formal citizens' committee similar to that used by the Base Realignment and Closure (BRAC) environmental cleanup program?</p> <p>Response: As noted earlier, the CACs have been established to provide this type of communication avenue between the public and the Army.</p>
2-11	Tooele - Meeting Page B-13	<p>Comment: Public involvement in the RCRA permit process has been minimal in the past.</p> <p>Response: Just as with the proposed change management process, the RCRA public involvement process provides the opportunity for the community to comment on proposed changes. Past participation in the RCRA permitting process is not necessarily indicative of future interest in proposed changes to facility design or operations.</p> <p>The Army plans to continue with efforts to encourage the local community to participate in the change management process. Specifically, the Army has produced a public involvement plan for change management that details multiple public outreach and public involvement activities designed to encourage the participation of interested citizens. The Army hopes that members of the public will utilize one of the communication mechanisms available to offer comments and become involved in the decision-making process.</p>

2-12	Tooele - Meeting Page B-13	<p>Comment: The public needs to have an organizer.</p> <p>Response: While the Army agrees that some citizens would find it helpful for each stakeholder group to have a leadership or organizational structure to streamline the process for collecting and voicing public concerns, designating an organizer or citizen leader would not be an appropriate role for the Army. Particularly because there are so many citizen viewpoints, the Army developed the proposed public involvement process to enable as many people as possible to contribute their ideas and voice their opinions as easily as possible, without the need to go through an Army-designated point of contact.</p>
2-13	Tooele - Meeting Page B-10	<p>Comment: The Army should use as many mechanisms as possible – beyond the usual public meeting format – to determine public opinion and receive public input.</p> <p>Response: The Army's proposed public involvement plan for change management directly responds to this comment. The plan details such mechanisms as utilizing PMCD's existing World Wide Web site to log comments, reformatting PMCD's existing toll-free telephone line to receive comments, and providing access to the World Wide Web through computers located in each outreach office. In addition, the CSDP overall public outreach and involvement strategy includes continued use of such tools as focus groups, community interviews and surveys to gauge public opinion and to record feedback directly from the public.</p>
2-14	Tooele - Meeting Page B-13	<p>Comment: The Army should continue to seek public comments and determine public opinion during facility operations, as well as during the initial RCRA permit phase.</p> <p>Response: The Army agrees that understanding public concerns and public perception of the job the Army is doing is critical to operating a safe and effective facility. The change management process is one method for achieving meaningful public participation throughout the life of the facilities.</p>

2-15	Tooele - Transcript Page 34	<p>Comment: The Salt Lake community should be targeted for public involvement.</p> <p>Response: The Army concentrates its public outreach efforts in the areas closest to and most affected by the disposal process. However, public meetings are always advertised in the Salt Lake Tribune and through radio announcements to ensure that the citizens of Salt Lake are aware of happenings related to the Tooele Chemical Agent Disposal Facility (TOCDF). The Army encourages all citizens who would like to become involved to do so.</p>
2-16	Tooele - Transcript Page 50	<p>Comment: The public service announcements that are printed in the newspapers are confusing.</p> <p>Response: The Army will explore methods to produce meeting announcements in clearer, more accessible language and will utilize other information materials to provide further details for those who are interested.</p>
2-17	Hermiston - Meeting Page B-15	<p>Comment: The Army should utilize local media outlets to present information to the community.</p> <p>Response: Outreach office staff and Army Public Outreach and Information Office personnel continue to investigate communication channels appropriate to each community. The public involvement plan for change management will include mechanisms for communicating with media contacts for local radio stations, television stations, and newspapers. The Army appreciates citizen input on media outlets that will reach a broad cross-section of each community.</p>
2-18	Hermiston - Transcript Page 58	<p>Comment: ICF Kaiser conducted a survey regarding the chemical demilitarization program in Hermiston and never provided follow-up information.</p> <p>Response: The results of this survey will be made available at the outreach offices.</p>

2-19	Tooele - Mailed Page B-8	<p>Comment: A method needs to be determined by all interested parties on how best to meet and solve the current problems of accountability related to the disposal of the chemical weapons stockpile.</p> <p>Response: While the workshops, the comment period, and other opportunities for public involvement focused specifically on the change management process and on site-specific public desires for involvement in that process, the Army certainly welcomes input on accountability issues through any of the communication mechanisms established to involve the public more fully.</p>
2-20	Tooele - Meeting Page B-12	<p>Comment: Can the Army provide a copy of a report produced by the NRC on systemization at the TOCDF?</p> <p>Response: Requests for this or other reports can be directed to the outreach offices or by calling PMCD's toll-free telephone line at 800-488-0648.</p>
SECTION 3: COMMENTS ON THE CHANGE MANAGEMENT PROCESS		
3-1	Tooele - Mailed Page B-2	<p>Comment: What regulatory authority did the Army use to formulate this new "policy"?</p> <p>Response: The Army is designated to execute the chemical demilitarization program by federal legislation. The change management process offers an avenue for public participation beyond the requirements dictated by public law.</p>
3-2	Anniston - Transcript Page 88	<p>Comment: Does the change management process just cover proposed changes to equipment or does it also include proposed changes to facility operations?</p> <p>Response: The change management process applies to changes to equipment and operations and is applicable in the following cases: (1) significant modifications to the furnace or pollution abatement systems, (2) increases in stack emission limits or process condition limits set by the permit, (3) significant modifications to agent and explosive handling operations within the two most external engineering control boundaries, (4) significant technology changes, and (5) other modifications determined to have significant potential for affecting the health risk assessment or quantitative risk assessment results.</p>

3-3	Anniston - Transcript Page 79	<p>Comment: Is the change management process only for those sites with permits?</p> <p>Response: Yes, the change management process applies only to sites with RCRA permits and comes into effect upon issuance of the permit (e.g., even prior to actual construction). However, the Army would confirm with the local community, through discussion with the CAC, whether or not the specific location is interested in and would support implementation of the process locally.</p>
3-4	Anniston - Transcript Page 20	<p>Comment: Would the proposed change management process be in effect throughout the life of a facility – through dismantlement?</p> <p>Response: At this time, PMCD anticipates that the proposed process would be utilized throughout the entire life of the facility. When the time comes to dismantle the facility, the change management process could be implemented if there were major changes to the closure plan that have a significant effect on the quantitative risk assessment results.</p>
3-5	Anniston - Transcript Page 49	<p>Comment: What is the role of the NRC in the change management process?</p> <p>Response: Because the NRC provides long-term oversight of the Army's demilitarization efforts, rather than offering real-time advice on a case-by-case basis, the NRC's involvement in the change management process would occur in two ways: 1) if the NRC determines that a specific proposed change warrants the Council's involvement, and 2) if the Army asks the NRC to place a specific proposed change on its agenda for more immediate review.</p>

3-6	Anniston - Transcript Page 86	<p>Comment: What do the different permit modification classes mean, and who is responsible for deciding when a change fits the criteria for a specific class?</p> <p>Response: The Code of Federal Regulations (40 CFR 270.42) defines each class as follows:</p> <ul style="list-style-type: none"> • Class 1 modifications are "minor change that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment." • Class 2 modifications enable a facility to respond to "[c]ommon variations in the types and quantities of wastes managed under the facility permit ... [t]echnological advancements, and ... [c]hanges necessary to comply with new regulations, where these changes can be implemented without substantially changing design specifications or management practices in the permit." • Class 3 modifications "substantially alter the facility or its operation." <p>However, the Alabama Department of Environmental Management (ADEM) uses the terms "major" and "minor" rather than class 1, 2, and 3. Minor changes correspond to class 1 modifications and major changes correspond to class 2 and 3 modifications.</p> <p>It should also be noted that the criteria triggering implementation of the change management process are no longer related to the RCRA permit modification classes. The specific change management process criteria for implementation are described in the response to Comment 3-2.</p>
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3-7	Tooele - Mailed Page B-7	<p>Comment: Is it possible that the same change proposed at two different sites could be implemented at one location and not at another? Would such a scenario contradict the Army's "lessons learned" process and Operational Verification Testing (OVT)?</p> <p>Response: It is true that the change management process allows for decisions to differ from one site to another based on local stakeholder input. However, it is important to understand that the change management process applies to baseline facilities that have met safety and environmental requirements prior to discussion of the proposed change.</p> <p>Safety and risk considerations are the most important decision criteria regarding proposed changes, but assessing these criteria often involves making site-specific value judgments. The risk assessments have shown that, while the overall risk is low, the level of risk varies, often by orders of magnitude, from site to site. This is due not only to geographical and meteorological differences, but also to population distributions, seismic activity, types of munitions to be destroyed, etc.</p> <p>To apply a particular change appropriate for one facility to all facilities program-wide would defeat the purpose of value assessments and minimize the impact of public involvement in the change management process. Such a scenario would not contradict the Programmatic Lessons Learned (PLL) process or OVT. The lessons learned program is intended to capture non-design changes, including management practices and policies and operating and maintenance practices. It is anticipated that changes that are adopted at one site and not at another would be design-oriented, reflecting the site's munitions inventory and other site-specific differences that affect the plant design. The focus of OVT was to validate the baseline technology to dispose of each munition and agent type. The OVT process, required by Public Law 100-456, enabled the Army to gain critical insight into the factors that establish a safe and effective rate of destruction for all munition and agent types before beginning full-scale operations.</p>
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3-8	Tooele - Mailed Page B-5	<p>Comment: Is there a regulatory requirement to incorporate "lessons learned" into the program? If not, how is adherence to the "lessons learned" process enforced?</p> <p>Response: There is no <i>regulatory</i> requirement to incorporate lessons learned into the program. The Army's lessons learned program is an <i>internal</i> requirement included in the <i>Chemical Agent Disposal Facility Risk Management Program Requirements</i> (specifically, requirement R5-11), which requires a process to be in place so that plant insights are supplied to the lessons learned program.</p>
3-9	Tooele - Mailed Page B-3	<p>Comment: There is no regulatory rationale for translating "lessons learned" into changes in facility design or operations. Isn't this just a method for manipulating OVT requirements?</p> <p>Response: The primary objective of the Johnston Atoll Chemical Agent Disposal System (JACADS) OVT that occurred from 1990 through 1993 was to demonstrate that the technology selected by the Army had the ability to demilitarize the chemical munitions stockpile in a manner consistent with the safety and environmental protection goals of the CSDP. However, the OVT did not preclude making future design changes as the Army gained more experience with operating the equipment and systems. The PLL, established by the Army in 1995, is intended to capture lessons from non-design changes that are learned through construction, systemization, operations, and closure phases of the CSDP. These lessons learned include management practices and policies, operating and maintenance practices, and agent monitoring. Hence, the PLL supplements, rather than invalidates, the OVT. It is possible that actions resulting from lessons learned information could lead to the identification of potential plant design changes. The change management process, outlined in the <i>Risk Guide</i>, is applied to evaluate the risk impact of the proposed change.</p>

3-10	Tooele - Transcript Page 75	<p>Comment: The Assembled Chemical Weapon Assessment (ACWA) program should be used as a model for the change management process.</p> <p>Response: While the ACWA program is successful, its focus is quite different than the focus of the change management process. The goal of the change management process is to engage as many citizens as possible who are interested in the disposal program and in the changes that occur at a specific facility. ACWA's purpose is to gain insight into technologies designed to destroy a specific set of chemical weapons (those with explosive components). A set group of stakeholders, rather than the citizenship as a whole, discusses and evaluates the technical options for handling the weapons. On the other hand, the change management process will involve multiple issues as the Army continues to propose changes to design, equipment or operations at each of its facilities. As a result, the Army expects and encourages participation in the decision-making process by the broadest cross-section of the public possible.</p>
3-11	Hermiston - Transcript Page 32	<p>Comment: The change management process should be applied to all aspects of the disposal facility not just changes affecting the RCRA permit.</p> <p>Response: Initially, the change management process was to be applied to RCRA Class 2 and 3 permit modifications. Based upon comments received, the Army has decided not to apply the change management process to all potential RCRA Class 2 and 3 modifications. Instead, the change management process will be applied in the following cases: (1) significant modifications to the furnace of pollution abatement systems, (2) increases in stack emission limits or process condition limits set by permit, (3) significant modifications to agent and explosive handling operations within the two most external engineering control boundaries, (4) significant technology changes, and (5) other modifications determined to have significant potential for affecting health risk assessment or quantitative risk assessment results.</p>

3-12	Anniston - Meeting Page B-21	<p>Comment: All ADEM permit modifications, not just major changes, should be addressed in the change management process.</p> <p>Response: The change management process addresses proposed major changes, as these carry the greatest potential for significant impact on risk. It should be noted that other comments received indicated that the public would be more likely to become involved and provide comments if the Army consistently brought to the community the most significant issues, and that the prospect of reviewing every change was viewed as unnecessarily burdensome.</p>
3-13	Anniston - Meeting Page B-20	<p>Comment: Alternative technologies need to be included in the change management process.</p> <p>Response: The Army plans for the process to be applicable to all chemical weapons disposal facilities, including those facilities utilizing alternative technologies. If additional needs specific to the more unique aspects of alternative technologies arise in the future, the Army will update the <i>Risk Guide</i> to address these needs.</p>
3-14	Anniston - Transcript Page 34	<p>Comment: If one of the technologies identified and tested through the ACWA program could be used in Anniston, would the change management process be used to evaluate the possibility of retrofitting the incinerator facility to accommodate the alternative technology?</p> <p>Response: It is uncertain currently whether any of the proposed ACWA technologies would be appropriate for destroying the complex munition and agent combinations stockpiled at Anniston. Additionally, the process to evaluate the proposed technologies could take as long as 18 months, so this is a hypothetical situation for the time being. That being said, however, if one of the technologies proved appropriate and could be incorporated into the operating facility, such a proposal would meet the criteria (described in the response to Comment 3-11) for implementation of the change management process.</p>

3-15	Tooele - Meeting Page B-13	<p>Comment: If the proposed process for management of changes is not improved, it won't work.</p> <p>Response: The Army acknowledges that the change management process can be improved and has used the local participation process to solicit changes in order to make the process more solid. The intent is to identify ways in which the change management process can be tailored to the needs of the individual communities.</p> <p>The Army's desire is to put in place a change management system that will work to the satisfaction of all involved. The Army is refining the change management process to adopt public participation methods that are appropriate to the local community (e.g., the best means of informing the public of the proposed change and how the public could conveniently communicate its comments to the Army).</p>
SECTION 4: COMMENTS ON RISK ASSESSMENTS IN THE CHANGE MANAGEMENT PROCESS		
4-1	Tooele - Mailed Page B-6	<p>Comment: How will value assessments for each proposed change be made and who will make these assessments?</p> <p>Response: Final determinations regarding the value of a proposed change will be based on several considerations – an evaluation of the possible risks posed by the change using established Quantitative Risk Assessment (QRA) and Health Risk Assessment (HRA) methods, risk sensitivity, cost, schedule, public input, treaty commitments, and any other factors pertinent to a specific change.</p> <p>The Army will issue a report for public review detailing the assessment results offering preliminary conclusions. Following the public participation cycle, the Army will make a final decision of whether to formally request a RCRA permit modification request. Ultimately the state environmental regulators make the final decision to approve or disapprove this request.</p>
4-2	Tooele - Mailed Page B-6	<p>Comment: The risk of storage needs to be re-evaluated for all proposed changes.</p> <p>Response: Storage risk is re-evaluated whenever delays occur and for all proposed changes that impact the HRA or QRA. The amount of delay and where in the schedule the delay is proposed to occur will determine how much the storage risk will increase.</p>

4-3	Hermiston - Transcript Page 92	<p>Comment: The risk of storage is greater than the risk of disposal processing; therefore, the program should move forward. Will the additional comment period generated by the change management process result in more delays?</p> <p>Response: The site specific QRAs indicate that the risk of stockpile storage significantly exceeds that of disposal. While the change management process public comment period requires a time commitment in the short run, the process is intended to avoid delays by forging greater consensus. By involving community members early in the process, the Army believes that agreement on the best course of action is more likely than in the past.</p>
4-4	Anniston - Transcript Page 59	<p>Comment: What level of independent oversight will be applied to the risk assessments performed in conjunction with the change management process?</p> <p>Response: The change management process is designed to complement existing processes, such as the RCRA permit modification process. As such, the Army may propose a change, present that change to the community for comment, and then submit the change to the state. Then, the state environmental regulators would evaluate the Army's proposal and make an independent assessment of whether or not the Army's conclusions were sound. Consequently, PMCD recognizes the state environmental agencies as providing one level of technical oversight for the Army's change management process. Additionally, this process, like all chemical demilitarization activities, is subject to review and oversight by multiple independent agencies, including the NRC, Environmental Protection Agency (EPA), and the Centers for Disease Control and Prevention (CDC).</p>
4-5	Anniston - Transcript Page 38	<p>Comment: Will the Army perform stand-alone risk assessments for each proposed change or compare the potential risk of a proposed change to the current facility's risk assessments?</p> <p>Response: The Army will determine the impact of the proposed change on the existing risk assessments, rather than perform stand-alone assessments of each change.</p>

4-6	Tooele - Mailed Page B-2	<p>Comment: Please clarify the circumstances under which a facility with an operating permit could become an Research, Development and Demonstration (RD&D) facility. What is the impact, if any, of the risk management policy on the RCRA Part B permit renewal process?</p> <p>Response: The TOCDF's current RCRA permit is for operating a hazardous waste facility as opposed to an RD&D facility. Federal regulations on RCRA facilities are quite specific as to which facilities are designated RD&D and which ones are operating facilities. According to 40 CFR 270.65, an RD&D permit may be issued “for any hazardous waste treatment facility which proposes to utilize an innovative and experimental hazardous waste treatment technology or process for which permit standards for such experimental activity have not been promulgated under part 264 of 266.”</p>
SECTION 5: COMMENTS ON PUBLIC INVOLVEMENT IN DEVELOPING RISK ASSESSMENTS		
5-1	Tooele - Mailed Page B-3	<p>Comment: How will the public be involved in the QRA process?</p> <p>Response: Unlike the HRA process, which specifically includes a public review step, public involvement in the QRA process has been limited to providing information through the CACs and making the associated reports available to the public. To effect a greater level of involvement that will meet PMCD public involvement objectives more fully, the Army currently is developing an enhanced public involvement approach specifically for the QRA process. The public involvement plans, and additional site-specific plans currently under development, will better identify public involvement in the QRA process.</p>
5-2	Tooele - Mailed Page B-5	<p>Comment: How will the public be involved in updating the Hazard Evaluations (HEs) and other (non-HRA) risk assessments?</p> <p>Response: As part of the change management process, the Army will begin updating the QRA, HRA and HEs to reflect the proposed change. Next, the Army will share with the public the results of how the proposed change would affect the QRA, HRA and HEs. Members of the public can use that information, along with information about other potential impacts from the proposed change, to evaluate the proposal and provide comments to the Army, thereby being involved in the assessments.</p>

5-3	Tooele - Mailed Page B-5	<p>Comment: To achieve effective public involvement, all concerned stakeholders need to help develop HRA criteria.</p> <p>Response: The Army is interested in citizens' concerns regarding the HRA criteria. However, the HRA criteria are developed by state regulators, using EPA guidance, and are not subject to the change management process. The Army suggests contacting your local state regulator to further discuss the HRA criteria.</p>
5-4	Anniston - Meeting Page B-17	<p>Comment: Will the final Environmental Impact Statements and the Health and Ecological Risk Assessments be readily available to the public?</p> <p>Response: As always, the Army plans to provide access to such documents through the outreach offices located in each community, as well as at additional information repositories.</p>
SECTION 6: GENERAL COMMENTS ON RISK ASSESSMENTS		
6-1	Tooele - Mailed Page B-3	<p>Comment: How is the QRA integrated into the HRA?</p> <p>Response: The QRA is not integrated into the HRA; both are risk assessment tools used to ensure safety. The QRA analyzes risk from potential accidents. The HRA analyzes risk arising from emissions during plant operations.</p>

6-2	Tooele - Mailed Page B-3	<p>Comment: How does the QRA and HRA determine hazard evaluation (e.g., does the QRA and/or HRA address the combined effects of different hazard evaluations and/or hazard quotients or just the individual effects of each hazard evaluation/hazard quotient)?</p> <p>Response: The risk measures considered in the QRA are presented in terms of acute fatalities for the nerve agents and mustard, and exposure-induced cancers from mustard (there are no latent effects, such as cancer, for nerve agents). For each postulated release of mustard, both acute and latent effects are considered. If an accident could result in the release of more than one agent, the impacts are combined to get the total effect.</p> <p>In the HRA, human exposures are considered to occur both directly (inhalation of emissions) and indirectly (ingestion of contaminated soil and food). Both carcinogenic and non-carcinogenic health effects from chemical agents, metals, volatile and semi-volatile products of incomplete combustion, and other combustion products are considered in the HRA. The estimated cancer risk reflects the combined effects of all carcinogenic substances present in the exhaust gas stream. The hazard index reflects combined chronic health effects on non-carcinogenic substances. The hazard index is the sum of the hazard quotients for all chemicals that affect a specific target organ.</p> <p>The results of these two risk assessments are not directly comparable. It is anticipated that value judgements regarding cumulative risk impact and risk trade-offs will often be required. Community viewpoints will play an important roles in these types of decisions.</p>
6-3	Tooele - Mailed Page B-4	<p>Comment: What does the term "off-normal" mean in regard to chemical agent releases from the disposal facility?</p> <p>Response: Accidental releases of a greater magnitude than the conditions defined in the HRA as "abnormal" are considered to be "off-normal." In other words, as suggested in the EPA screening assessment guidance, the HRA assumes that five percent of the time organic emissions are ten times higher than normal, while 20 percent of the time metals emissions are ten times higher than normal. Accidental releases that fall outside these parameters for abnormal emissions are called "off-normal."</p>

6-4	Tooele - Mailed Page B-6	<p>Comment: What is meant by the term "societal average" in regard to the risk of fatalities?</p> <p>Response: The term "societal average fatality risk" is the average number of expected fatalities in the surrounding population. The risk is uncertain, but a statistically average risk can be calculated. The TOCDF QRA report includes a detailed discussion of risk and risk measures. The next update to the <i>Risk Guide</i> will include more discussion on this point and a cross-reference to other discussions.</p>
6-5	Anniston - Meeting Page B-20	<p>Comment: Risk assessments need to be site-specific and address such areas as polychlorinated biphenyl (PCB) and dioxin levels in the local populations.</p> <p>Response: In accordance with EPA guidance, the Anniston HRA was a screening level HRA. A screening level HRA is typically more conservative than a site-specific HRA. Although not strictly a site-specific HRA, meteorological and geographic conditions specific to Tooele were considered. As specified in the EPA guidance, a site-specific HRA is only necessary if the results of the screening level HRA are above established risk screening criteria.</p> <p>The HRA protocol was developed by the State of Alabama regulators and was conducted in accordance with established procedures and EPA guidance. The Army is interested in citizens' concerns regarding the HRA and can forward comments to the appropriate state officials.</p>
6-6	Tooele - Mailed Page B-3	<p>Comment: What is programmatic risk?</p> <p>Response: As noted in Appendix B of the <i>Risk Guide</i>, programmatic risk is associated with schedule and cost, including effects in and out of the control of the program. Thus, programmatic risk includes a potential cost increase due to a permitting delay. Programmatic risk is a management term for the function of controlling risks that are important to the control of costs.</p>

6-7	Tooele - Mailed Page B-7	<p>Comment: Is it correct to assume that the facilities constructed earlier will be "experimental" and that, as a result, the Army did not complete OVT as intended by Congress?</p> <p>Response: The intent of OVT as mandated by Public Law 100-456 was to demonstrate the efficiency and safety of the JACADS process before full-scale operations began in the continental United States. The law did not preclude subsequent improvements to the demilitarization process once OVT was completed.</p>
6-8	Tooele - Mailed Page B-5	<p>Comment: How will the incorporation of Design Lessons Learned (DLLs) and PLLs meet the accepted criteria of the HRA?</p> <p>Response: The DLLs and PLLs are intended to identify potential improvements in the program and have no direct relationship to the HRA. If a major change is proposed as a result of the lessons learned process, its impact on the HRA will be evaluated as proposed in the change management process.</p>
6-9	Tooele - Mailed Page B-7	<p>Comment: Is it correct to assume that the OVT process is on-going and that the last baseline facility constructed will be better in design, safety, and effectiveness than the other baseline facilities constructed earlier?</p> <p>Response: OVT specifically was a legal requirement for the Army to demonstrate the safety and efficiency of the JACADS facility prior to starting operations in the United States. The OVT demonstrations were completed in March 1993. The change management process provides for evaluation of future facility and operational improvements.</p>
SECTION 7: COMMENTS ON THE <i>GUIDE TO RISK MANAGEMENT POLICY AND ACTIVITIES</i>		
7-1	Tooele - Mailed Page B-1	<p>Comment: The <i>Risk Guide</i> contains very little information on public involvement. Will this be remedied in future versions of the document?</p> <p>Response: Yes, as planned, the updated version of the <i>Risk Guide</i> will incorporate the comments received during the public workshops and comment period to expand the public involvement section. In addition, the Army has developed a public involvement plan specifically to accompany the change management process. This plan offers further details on the role of public involvement in the decision-making process. The public involvement plan also will be included in the <i>Risk Guide</i>.</p>

7-2	Tooele - Mailed Page B-2	<p>Comment: The <i>Risk Guide</i> seems to imply that the public does not understand the regulatory process. However, the Army should acknowledge that some members of the public understand environmental regulations more fully than the Army does.</p> <p>Response: The <i>Risk Guide</i> was intended as a starting point for discussions of how the public prefers to be involved in the change management process. As the change management process is targeted towards a broad audience, the language was developed to as accessible as possible.</p>
7-3	Tooele - Mailed Page B-3	<p>Comment: The Public Outreach section of the <i>Risk Guide</i> does not acknowledge the public's mistrust of the Army's statements about the safety of chemical weapons disposal facilities. The Army must recognize that such facilities are not like other hazardous waste facilities.</p> <p>Response: The Army does recognize that chemical weapons disposal facilities are not like any other hazardous waste facilities. The Army is implementing the change management process as a tool for including local community in the decision process. The public involvement plan has been developed to supplement the <i>Risk Guide</i>. It is incumbent upon the Army to earn the public trust through the change management process and other public participation initiatives.</p>
7-4	Tooele - Mailed Page B-2	<p>Comment: The <i>Risk Guide</i> merely serves as another forum for the Army to promote incineration as the disposal method of choice, despite on-going public concern about the risks associated with incineration and despite releases that have occurred at the operating facilities.</p> <p>Response: The change management process, as defined in the <i>Risk Guide</i>, is intended to promote meaningful communication between the Army and the community on this and other concerns. It was developed as a technology neutral method for evaluating a the risks and benefits of a broad range of potential changes. The Army hopes that concerned residents will continue to engage in the dialogue process.</p>

7-5	Tooele - Meeting Page B-10	<p>Comment: The <i>Risk Guide</i> is lacking in that it does not address the "big picture" with respect to public concerns surrounding military installations – open burning/detonation, ground water contamination, etc.</p> <p>Response: While the change management process is a part of the Army's overall risk management program, it is not the intent of this process to address issues other than those related to proposed changes to the established baseline configuration of a chemical demilitarization facility. However, the Army is evaluating the possible expansion of the public involvement approaches developed for the change management process to other activities within the chemical demilitarization program.</p>
7-6	Tooele - Mailed Page B-1	<p>Comment: The terms public input, public involvement, and public outreach have different meanings and should not be used interchangeably.</p> <p>Response: For purposes of clarification, public outreach is defined here as the process of disseminating information about the program to the public. Public involvement is defined as the process by which public concerns, needs and values are incorporated into government decision making. Public input is the information that is provided to the Army by the public regarding the disposal program.</p>
7-7	Tooele - Mailed Page B-5	<p>Comment: Section 5.2 of the <i>Risk Guide</i> should have a discussion on public participation.</p> <p>Response: A discussion of the public's role in plant operations will be added to the next edition of the <i>Risk Guide</i>.</p>
7-8	Tooele - Mailed Page B-1	<p>Comment: Is the <i>Risk Guide</i> meant to be site-specific or general?</p> <p>Response: The <i>Risk Guide</i> is intended to be a general document, for use program wide at each of the chemical weapons disposal facilities. However, the public involvement process – as determined with input from the Anniston, Hermiston, and Tooele communities – will occur on a site-specific basis, dependent on the particular changes proposed at each facility. As such, the next edition of the <i>Risk Guide</i> will describe public involvement within the change management process at a more general level. The public involvement plan the Army is developing to accompany the change management process will document specific public involvement activities and methods for use at the site level.</p>

7-9	Tooele - Mailed Page B-2	<p>Comment: The <i>Risk Guide</i> should include information on RD&D permit modifications.</p> <p>Response: While the change management process is separate from the RCRA permitting process, its focus is on proposed changes to the baseline facility configuration (which is the configuration approved by the RCRA permit). The change management process applies to the eight continental United States chemical demilitarization facilities no matter what type permit they may have. This will be clarified in the next revision of the <i>Risk Guide</i>.</p>
7-10	Tooele - Mailed Page B-8	<p>Comment: In light of the congressional mandate to explore at least two additional disposal technologies, will the <i>Risk Guide</i> be applicable to sites where an alternative technology to incineration is used?</p> <p>Response: Yes, the <i>Risk Guide</i> is applicable to all chemical weapons disposal facilities, including those facilities utilizing alternative technologies. If additional needs specific to the more unique aspects of alternative technologies arise in the future, the Army will update the <i>Risk Guide</i> to address these needs.</p>
7-11	Tooele - Mailed Page B-6	<p>Comment: In reference to the section in the <i>Risk Guide</i> on assessing and summarizing risk, there should be an additional category for environmental risk.</p> <p>Response: The Ecological Risk Assessment (ERA), which is part of the RCRA Part B permit risk assessment, will be added to the <i>Risk Guide</i> to address environmental risk. The impact that a proposed change has on the risk to ecological receptors (e.g., fish and fauna) will then be evaluated as part of the change management process. The scope of the ERA will be consistent with that required in the RCRA permit.</p>

7-12	Tooele - Mailed Page B-2	<p>Comment: It is not clear if the change management process workshops followed the state and federal requirements for public participation (e.g., Administrative Procedure Act). Does the process outlined in the <i>Risk Guide</i> follow state and federal requirements for public input?</p> <p>Response: The Administrative Procedure Act defines requirements for public notifications and responses to public comments when public review is mandated by regulation, such as for Rulemaking. The change management process is a voluntary Army initiative required neither by state or federal regulation. Rather, it is intended to complement existing public reviews, such as those required under RCRA and National Environmental Policy Act, by engaging the local communities at the earliest stage of the decision process. As such, the Administrative Procedure Act is not applicable to the change management process, and any changes that are eventually implemented will comply with any applicable permit requirements for public notice.</p>
7-13	Tooele - Mailed Page B-4	<p>Comment: The <i>Risk Guide</i> does not discuss the calculation of the hazard index for the public.</p> <p>Response: The chronic, noncarcinogenic hazard index is calculated for the public, and the acute hazard index is calculated for the public and workers. A discussion of the chronic hazard index and the acute hazard index will be included in the next revision of the <i>Risk Guide</i>.</p> <p>The hazard index is obtained by adding all of the hazard quotients for all chemicals that affect specific target organs. The hazard quotient represents the potential long-term adverse health impact of exposure to a toxic chemical emitted from the incinerator stacks. It is expressed as a ratio of a receptor's dose resulting from exposure to a single substance for a specified time period to a reference dose for that substance for a similar time period.</p>
7-14	Tooele - Mailed Page B-6	<p>Comment: Non-carcinogenic emissions need to be addressed in Section 7.1.3 of the <i>Risk Guide</i>.</p> <p>Response: The EPA established a hazard index of 0.25 for chronic non-carcinogenic exposure. A hazard index at or below 0.25 is acceptable from a health risk standpoint. The next version of the <i>Risk Guide</i> will include the non-carcinogenic effects of emissions.</p>

7-15	Tooele - Mailed Page B-8	<p>Comment: In the <i>Risk Guide</i>, more uptake pathways need to be considered in addition to inhalation to better understand the off-site effects of exposure.</p> <p>Response: The QRA documentation includes detail on the pathways modeled in the QRA; a brief summary of additional pathways will be included in the revised version of Appendix C in the <i>Risk Guide</i>.</p>
7-16	Tooele - Mailed Page B-4	<p>Comment: The <i>Risk Guide</i> states that as QRA information becomes available, the Emergency Planning Guides will be updated to include the latest information and to form a planning basis for potential risks associated with stockpile storage. This statement implies that the risk of storage is much greater than it is. What is the potential risk of storage of chemical weapons?</p> <p>Response: The <i>Risk Guide</i> will be updated to reflect the fact that the latest QRA information will be available for forming a planning basis for potential risk associated with both the stored stockpile and disposal facility activities. The TOCDF QRA results are provided for disposal processing, stockpile storage during processing, and 20 years of stockpile storage. The results show that the risk of storage is greater than that for disposal processing. The results of the TOCDF QRA indicated that the fatality risk is approximately 0.0001 for 7.1 years of disposal processing; 0.002 for 7.1 years of stockpile storage during processing; and 0.03 for 20 years of continued storage with no processing. The storage risk is dominated by the potential for seismic events (at Tooele) and is higher because of the larger inventory of munitions in the stockpile (and the munition storage configurations). The potential for spontaneous rocket autoignition is not yet factored into the QRA because laboratory chemistry work is not yet conclusive.</p>

7-17	Tooele - Mailed Page B-6	<p>Comment: There needs to be more discussion in the <i>Risk Guide</i> of the risk-based process method used in the QRA in regard to storage, storage during processing, and continued storage.</p> <p>Response: The QRA includes calculations of storage risk on a campaign basis (chapter 15). Munitions are removed from storage as they are processed. Since the risk of processing is so much less than the risk of storage, the incremental risk of processing munitions is more than offset by removing munitions from potential storage risk scenarios. While it is not the purpose of the <i>Risk Guide</i> to explain risk in detail or to focus on one site, note that the TOCDF QRA does not state safe storage intervals to 2013 or any other year. A December 1994 report, <i>M55 Rocket Safe Storage Life Evaluation</i>, discusses storage risk of autoignition involving rockets in terms of safe storage intervals. Autoignition was not included in the QRA due to the lack of a scientific basis for estimation, which is now currently being developed through laboratory testing.</p>
7-18	Tooele - Mailed Page B-5	<p>Comment: As stated in the <i>Risk Guide</i>, how can a risk be accepted as high, but then approved by formal waiver as a necessary risk?</p> <p>Response: The statement will be clarified in the update. If the Program Manager accepts a high risk hazard, there is no need for a waiver. Mitigation options to identify further risk controls are always considered for risk assessment code 1 and 2 hazards.</p>
7-19	Tooele - Mailed Page B-1	<p>Comment: According to regulations, incineration is a treatment method, not a disposal method.</p> <p>Response: Public Law 104-484 established the use of the term "disposal" with respect to the chemical demilitarization program. As such, that language has been incorporated throughout the risk assessments and the <i>Risk Guide</i> to ensure continuity.</p>
7-20	Tooele - Mailed Page B-1	<p>Comment: All acronyms in the <i>Risk Guide</i> need to be defined (e.g., NUREG-1150).</p> <p>Response: Acronyms are defined in Appendix A of the <i>Risk Guide</i>. NUREG is not an acronym, but rather the numbering system used by the Nuclear Regulatory Commission. Specifically, NUREG-1150 is the document titled "Severe Accident Risks: An Assessment for Five U.S. Nuclear Power Plants."</p>

7-21	Tooele - Mailed Page B-3	<p>Comment: The <i>Risk Guide</i> is described as both a final document and a document that will be updated periodically. How can the Army update the <i>Risk Guide</i> if it is final?</p> <p>Response: The Army's intent was to issue the <i>Risk Guide</i> as a final document to provide guidance to PMCD personnel regarding the on-going risk management program. As specifically stated in the foreword, the <i>Risk Guide</i> can be updated to reflect enhancements to the risk management program. Additionally, this "first edition" of the <i>Risk Guide</i> was designed specifically to encourage community input into developing the public involvement portion of the change management process. As a result, the Army is currently revising the document to include comments received from members of the public during the workshops held in July 1997. The next edition of the document will incorporate these comments.</p>
7-22	Tooele - Mailed Page B-3	<p>Comment: The definition of risk has two implied meanings and is confusing to the public.</p> <p>Response: Risk is a measure of loss or harm that could result from chemical weapons storage or disposal operations. The risk of individual accidents is calculated by multiplying the frequency of the accident by the consequences of the accident. Total risk is calculated by adding the risk from all of the individual accidents. The wording regarding the definition of risk will be clarified in the next edition of the <i>Risk Guide</i>.</p>
7-23	Tooele - Mailed Page B-4	<p>Comment: The words "engineering" and "scientific" cannot be used interchangeably, as they are in the <i>Risk Guide</i>.</p> <p>Response: The <i>Risk Guide</i> does not use these words interchangeably. In the discussion of risk assessments, the <i>Risk Guide</i> indicates that they are both engineering and scientific efforts. The Army will ensure that the next edition of the <i>Risk Guide</i> does not appear to use the words interchangeably.</p>

7-24	Tooele - Mailed Page B-4	<p>Comment: The <i>Risk Guide</i> should note that RCRA Part B permits require contingency plans and preparedness and prevention plans, which are different from the emergency preparedness requirements of the Chemical Stockpile Emergency Preparedness Program (CSEPP).</p> <p>Response: The QRA results are available for CSEPP and all emergency preparedness activities, including those identified in the RCRA Part B permits. The next edition of the <i>Risk Guide</i> will clarify this point.</p>
7-25	Tooele - Mailed Page B-8	<p>Comment: The reference to Public Involvement and the Army Chemical Disposal Program, dated October 1996, is not listed in the <i>Risk Guide</i>.</p> <p>Response: The following reference will be added to the <i>Risk Guide</i>: <i>Public Involvement and the Army Chemical Stockpile Disposal Program</i>, NRC Committee on Review and Evaluation of the Army Chemical Stockpile Disposal Program, Washington, DC, National Academy Press. Copies of this document are available by calling (800) 624-6242.</p>
7-26	Tooele - Mailed Page B-7	<p>Comment: The <i>Risk Guide</i> indicates that public involvement plans have not been completed for JACADS and TOCDF. Have official plans been completed for these two operating facilities?</p> <p>Response: The public involvement plan for JACADS was produced in the early 1990s. Public meetings were held in Hawaii to introduce the plan. The TOCDF public involvement plan was produced in 1995, pursuant Army Regulation 360-61 for start-up of operations. However, the plan was updated after conducting public interviews, focus groups, and surveys. The <i>Risk Guide</i> will be updated to include this information.</p>
7-27	Tooele - Mailed Page B-8	<p>Comment: The <i>Risk Guide</i> states that "public participation may face the toughest 'authority,' a skeptical public." Should this sentence be rewritten to indicate that "the Army may face the toughest 'authority,' a skeptical public"?</p> <p>Response: The <i>Risk Guide</i> attempted to indicate the Army's overarching concern regarding public involvement: that the public involvement program may be met by a public skeptical that their voices can make a contribution to the decision-making process. The Army will clarify this passage in the next edition of the <i>Risk Guide</i>.</p>

7-28	Tooele - Mailed Page B-8	<p>Comment: Many words in Appendix B: Risk Management Glossary have multiple meanings. It is confusing to the public when words that have one meaning in everyday language have another meaning when used within the context of the <i>Risk Guide</i>.</p> <p>Response: The intent of Appendix B in the <i>Risk Guide</i> is to provide a clear and concise definition of commonly-used risk terms. The Army will clarify, wherever possible, the terms that are used throughout the <i>Risk Guide</i>.</p>
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